

Gas STAR Gold Program Comments/Questions

“EPA proposes a “Gas STAR Platinum” status for recognizing companies that achieve Gold status exceeding a certain proportion of their facilities, e.g., at least 90% of their facilities in a given year.”

Comment: The 90% figure doesn’t help operators who have less than 10 onshore “facilities”, like Noble Energy. We would need 100% Gold status to reach platinum.

“Maintaining the current Natural Gas STAR Program. EPA appreciates the feedback we have received from our Partners about the value of the Natural Gas STAR Program. EPA plans to maintain the current Natural Gas STAR Program and will continue core Natural Gas STAR Program activities such as technology transfer workshops. EPA looks forward to continuing to work with our Natural Gas STAR Partners to achieve methane emission reductions.”

Comment: If the current program remains and estimated methane reduction numbers are requested, we suggest some guidance on leak emission factors to use for estimating methane emissions from leaks detected by IR cameras on production sites.

“EPA proposes an annual reporting cycle (e.g., annual reports on Gas STAR Gold facilities due each spring).”

Comment: A mid-year reporting due date would be preferable due to numerous other reporting obligations in the spring.

“a) In addition to recognition through the Program, what are the key incentives for companies to participate in this enhanced program?”

Comment: Corporate social responsibility and public relation efforts. We want the public to know we are making the extra effort to reduce emissions and we care about the environment.

“c) How can EPA best market this program to key stakeholders including company management and boards, state and local regulators, NGOs, investors, shareholders, and the public?”

Comment: Online news articles could be a good way to educate people on the program and list companies who achieve gold and platinum status.

“c) EPA seeks feedback on specific aspects of implementing the Program at the facility level including handling acquisitions and divestitures for the production segment.”

Comment: Acquisitions should be given a grace period before being required to implement all protocols, perhaps 2 years.

Proposed Protocols

Associated Gas and Casinghead Gas

Comment: These are listed as two different emission sources with different protocols, but they seem to be very similar emission sources. We request that the difference between associated gas and casinghead gas is clearly defined.

Casinghead Gas Protocol: “If (1) does not apply, for facility where emissions can be economically captured for beneficial use, capture casinghead gas. Beneficial use does not include flaring.”

Comment: The phrase “where emissions can be economically captured for beneficial use” seems to be subjective and could be open to interpretation. We would like the phrase to be defined. Would we have to prove emissions could not be captured economically? How?

Gas-driven Pneumatic Devices (bleed controllers, manual actuators, and pumps)

“1. Where instrument air or nitrogen is available, install instrument air or nitrogen driven devices.”

Comment: Seems whether or not instrument air is “available” could be open to interpretation. Does it mean “currently available on location” or “economically feasible”?

Liquid Unloading

“1. Install or maintain a closed loop system that eliminates all methane emissions with the exception of emissions resulting from system failures or emergency situations.”

Comment: Unless most events could be interpreted as system failures, due to the large number of liquid unloading events performed on historical vertical wells in most basins, eliminating all methane emissions would not be feasible for many production segment companies. We recommend clearly defining a liquid unloading.